

Atlanta

Denver

Los Angeles

Philadelphia

**McKenna Long
& Aldridge^{LLP}**
Attorneys at Law

1900 K Street, NW • Washington, DC 20006
202.496.7500 • Fax: 202.496.7756
www.mckennalong.com

San Diego

San Francisco

Washington, DC

Brussels

REL S. AMBROZY
(202) 496-7693

EMAIL ADDRESS
rambrozy@mckennalong.com

January 24, 2007

VIA E-MAIL AND U.S. MAIL

Frank E. Merideth, Jr.
Greenberg Traurig LLP
2450 Colorado Avenue
Suite 400E
Santa Monica, CA 90404
MeridethF@GTLAW.com

Re: LG.Philips LCD Co., Ltd. v. ViewSonic Corporation, et al.;
U.S. District Court Case No. 04-343 JJF

Dear Frank:

As requested by Special Master Poppiti during the January 19, 2007 hearing, LPL identifies the following nine broad categories directed to all of Tatung's visual display products. We believe that these categories not only capture all the possible permutations of the possible mounting systems, but it also works with each parties' proposed claim constructions.

In regard to your concern raised in your January 8th letter to the Court that definitions may be a problem, we offer two comments. First, see our correspondence of January 18th stating that any definition Tatung relies on to identify the aspects of the flat panel display device in a given category makes no difference to LPL - we simply need to know what that definition is. Second, given the parties have briefed the construction (*i.e.*, meaning) of the terms needed to categorize the Tatung products by "mounting system," (*e.g.*, housing and first frame), your concern about definitions is moot.

LPL's proposed categories are as follows:

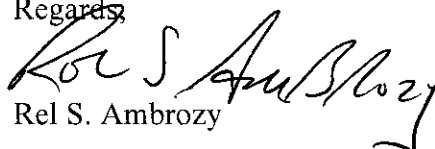
- Category 1:** Visual display product includes a first frame having a fastening element(s) located on the rear surface of the first frame, the fastening element(s) positioned on or inside the border of the flat display panel.
- Category 2:** Visual display product includes a first frame having a fastening element(s) located on the rear surface of the first frame, the fastening element(s) positioned outside the border of the flat display panel but not extending beyond any of the four edges of the flat panel display device.

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- Category 3:** Category 1 + Visual display product includes a fastening element(s) located on a flange of the first frame that extends beyond any of the four edges of the flat panel display device.
- Category 4:** Category 2 + Visual display product includes a fastening element(s) located on a flange of the first frame that extends beyond any of the four edges of the flat panel display device.
- Category 5:** Category 1 + Visual display product includes a side mounting fastening element(s).
- Category 6:** Category 2 + Visual display product includes a side mounting fastening element(s).
- Category 7:** Not Categories 1 or 2. Visual display product includes a fastening element(s) located on a flange of the first frame that extends beyond any of the four edges of the flat panel display device and does not include a side mounting fastening element(s).
- Category 8:** Not Categories 1 or 2. Visual display product includes a side mounting fastening element(s) and does not include a fastening element(s) located on a flange of the first frame that extends beyond any of the four edges of the flat panel display device and does not include a side mounting fastening element(s).
- Category 9:** Category 7 + Category 8. Visual display product includes a side mounting fastening element(s) and a fastening element(s) located on a flange of the first frame that extends beyond any of the four edges of the flat panel display device.

Please provide us with your response by Friday if possible, as we need to inform Special Master Poppiti if we were able to agree on the mounting system categories for the Tatung products no later than Monday January 29, 2007. Of course this entire exercise could be avoided if you simply provided us with the categories that Tatung employed in producing the Tatung Co. documents.

Regards,


Rel S. Ambrozy

RSA:ms

cc: Tracy R. Roman (via email)

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Scott R. Miller (via email)
Mark H. Krietzman (via email)
Valerie W. Ho (via email)
Jong P. Hong (via email)
Manuel Nelson (via email)
Steve Hassid (via email)
Anne Shea Gaza (via email)
Fred Cottrell (via email)
Jaclyn Michel Mason (via email)
Jeffrey B. Bove (via email)
Richard Horwitz (via email)

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